## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ANNABEL K. MELONGO	)
	)
Plaintiff,	) 13 C 4924
	)
vs.	) Honorable Judge
	) John Z. Lee
ASA ROBERT PODLASEK, ET AL.,	)
	) Magistrate Judge
Defendants.	) Sheila M. Finnegar

## **DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Now Comes the Defendants, Assistant State's Attorney Robert Podlasek, Assistant State's Attorney Julie Gunnigle, Investigator Kate O'Hara, Investigator James Dillon, Investigator Antonio Rubino, Investigator Rick Lesiak and Cook County, by their attorney Kimberly M. Foxx, State's Attorney of Cook County, through her Assistant State's Attorney Bianca B. Brown, and move for Summary Judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure.

The attached Local General Rule 56.1 (a) statement of material uncontested facts and memorandum of law in support of this motion set forth Defendants' position and are hereby incorporated into this motion.

Respectfully submitted,

KIMBERLY M. FOXX State's Attorney of Cook County

By: /s/Bianca B. Brown
Bianca B. Brown
Assistant State's Attorney
Civil Actions Bureau
500 Richard J. Daley Center
Chicago, IL 60602
(312) 603-6638

## **CERTIFICATE OF SERVICE**

I hereby certify that I have caused true and correct copies of the above and foregoing to be served on all parties of record via ECF, in accordance with the rules of electronic filing of documents, and caused it to be served electronically on this 16th day of July, 2018.

/s/ Bianca Brown
Bianca Brown